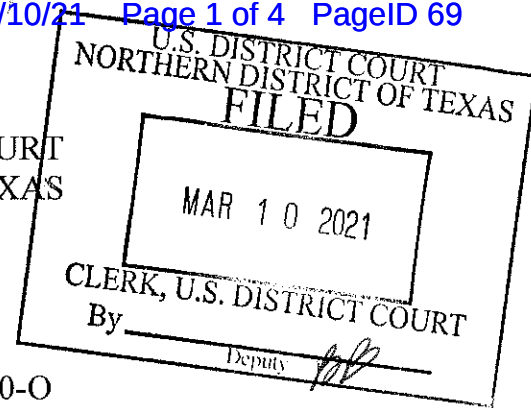


ORIGINAL

SEALED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

CHRISTOPHER MCCLEARY (01)

QUMAIN BLACK (02)

ADAM ANDERSON (04)

No. 4:21-CR-030-O

[Supersedes indictment returned on  
February 10, 2021]

SUPERSEDING INDICTMENT

The Grand Jury Charges:

Count One

Possession of Firearm While Under Felony Indictment  
(Violation of 18 U.S.C. §§ 922(n) and 924(a)(1)(D))

On or about August 19, 2020, in the Fort Worth Division of the Northern District of Texas, the defendant, **Christopher McCleary**, who was then under indictment for a crime punishable by imprisonment for a term exceeding one year, did willfully receive the following firearm: a Glock, model 19, 9mm pistol, serial number EFW909, said firearm having been shipped and transported in interstate and foreign commerce.

In violation of 18 U.S.C. §§ 922(n) and 924(a)(1)(D).

Count Two

Conspiracy to Commit Sex Trafficking Through Force, Fraud, and Coercion  
(Violation of 18 U.S.C. §1594(c))

Beginning in or around July 2020 and continuing through in or around October 15, 2020, the exact dates being unknown, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendants **Christopher McCleary, Qumain Black,** [REDACTED] [REDACTED] and **Adam Anderson,** along with others known and unknown, conspired and agreed with each other to knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, the following individuals, AV1, AV2, and AV3, knowing, and in reckless disregard of the fact, that force, threats of force, fraud and coercion, and any combination of such means would be used to cause AV1, AV2, and AV3 to engage in commercial sex acts.

In violation of 18 U.S.C. § 1594(c) (18 U.S.C. § 1591(a)(1)).

Forfeiture Notice

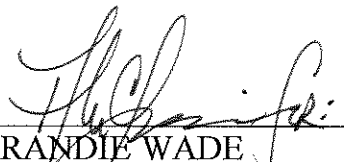
(18 U.S.C. §§ 924(d) and 1594(d) and 28 U.S.C. § 2461(c))

Upon conviction for any of the offenses alleged in Counts One and Two of this Indictment and pursuant to 18 U.S.C. § 1594(d), the defendants **Christopher McCleary**, **Qumain Black**, [REDACTED] and **Adam Anderson** shall forfeit to the United States any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations and any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violations.

A TRUE BILL.

  
\_\_\_\_\_  
FOREPERSON

PRERAK SHAH  
ACTING UNITED STATES ATTORNEY

  
\_\_\_\_\_  
BRANDIE WADE  
Assistant United States Attorney  
Texas State Bar No. 24058350  
801 Cherry Street, Suite 1700  
Fort Worth, Texas 76102  
Telephone: 817.252.5200  
Facsimile: 817.252.5455

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

---

THE UNITED STATES OF AMERICA

v.

CHRISTOPHER MCCLEARY (01)

QUMAIN BLACK (02)

  
ADAM ANDERSON (04)

---

SUPERSEDING INDICTMENT

18 U.S.C. §§ 922(n) and 924(a)(1)(D)  
Possession of Firearm While Under Felony Indictment  
Count 1

18 U.S.C. § 1594(c) (18 U.S.C. § 1591(a)(1))  
Conspiracy to Commit Sex Trafficking Through Force, Fraud, and Coercion  
Count 2

18 U.S.C. §§ 924(d) and 1594(d) and 28 U.S.C. § 2461(c)  
Forfeiture Notice

---

A true bill rendered

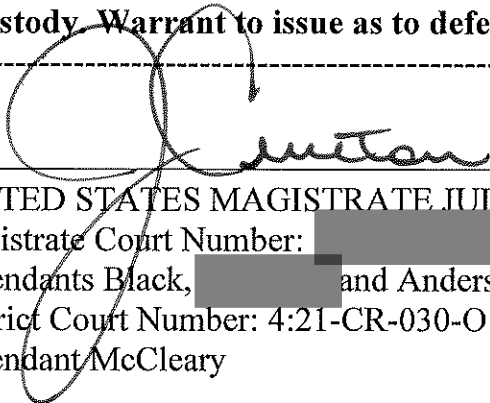


FORT WORTH

Filed in open court this 10th day of February, 2021.

  
FOREPERSON

---

Defendants (01) and (02) in custody. Warrant to issue as to defendants  (04).

  
UNITED STATES MAGISTRATE JUDGE  
Magistrate Court Number:  as to  
Defendants Black,  and Anderson  
District Court Number: 4:21-CR-030-O as to  
Defendant McCleary

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

ADAM ANDERSON (03)

No. 4:21-MJ-

71

**WARRANT FOR ARREST**

TO: The United States Marshal and  
Any Authorized Officer of the United States

YOU ARE HEREBY COMMANDED to arrest ADAM ANDERSON , and bring him forthwith to the nearest available magistrate to answer a Complaint charging him with Human Trafficking, a violation of Title 18, United States Code, Sections 1594(c) and 1591(a)(1) and (a)(2) and (b)(1).

Hal R. Ray Jr.  
~~JEFFREY L. CURETON~~ HAL R. RAY, JR.  
UNITED STATES MAGISTRATE JUDGE

Issued at Fort Worth, Texas on this 1<sup>st</sup> day of February, 2021.

**RETURN**

This warrant was received and executed with the arrest of the above-named defendant at \_\_\_\_\_.

DATE RECEIVED:	NAME AND TITLE OF ARRESTING OFFICER:	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST:		